SENATE AGRICULTURE
EXHIBIT NO. 20
DATE 3-12-09
BILL NO. HB 418

March 12, 2009

Mr. Chairmen and committee members:

I am Dr. Krista Lorenz, a veterinarian from Belgrade, MT. I oppose HB 418. I am here as an advocate for many veterinarians that object to the AVMA and AAEP position that equine slaughter for human consumption is acceptable.

As a veterinarian, I feel a responsibility to comment on the use of medications in horses and consumer safety. Traditional food animals are raised with the intent of one day becoming human food and therefore have strict FDA guidelines as to what medications can be given and what medications are banned from ever be given. Medications that can be given have very specific withdrawal periods before the animal can be slaughtered. Horses on the other hand are not monitored and often receive those medications that are strictly prohibited for use in any animal intended for human consumption. Included in the list of drugs that are prohibited for use in horses intended for food by the FDA are thses commonly given drugs: Phenylbutazone (commonly referred to as 'bute'), acepromazine, Equipoise, GastroGard, Ketofen, any wormer that is ivermectin based, xylazine, gentamycin, penicillin, Regumate, Lasix, hyaluronic acid, Strongid C, topical nitrofurazone, Adequan, Ventipulmin, Quest wormer, and Pergolide. Horses going into the slaughter process have no records and come from various sources around the country so there is no way to know what is in any given horse's system at the time of slaughter unless every single horse is tested and that is econimically unfeasible. If a traditional food animal producer tried to illegally medicate their animals they would face fines and prosecution. Producing meat from horses with unknown histories is a serious food safety violation and should not even be considered. Humans exposed to the aforementioned drugs through tainted meat are at risk for getting life altering illnesses(Bute can cause aplastic anemia in people). How can we or why would we want to take that chance? Does Montana really want that kind of reputation that could potentially bring in to question the safety of our other meat industries? Even the European Union and United Kingdom member countries have a distinct safety policy with regard to horses entering the food chain. Any EU or UK horse that has ever received a medication that is banned for use in food producing animals is forever prohibited from entering the food chain, they keep track of this with an expensive microchip and equine passport system(EU Council Directive 2002/99/EC).

I also want to clarify that even though the AAEP supports equine slaughter, their own guidelines specifically state that the penetrating captive bolt gun is acceptable ONLY IF it is administered by a licensed veterinarian who has been properly trained AND there is adequate physical restraint to ensure proper placement. This has not been followed in US slaughter facilities. Their guidelines also state that we as veterinarians are duty bound to provide horses with a 'good death' and recommend euthanasia be administered on site in surroundings with which the horse is familiar. If that is not feasible, the horse should be transported to the nearest facility possible in order to minimize any further stress or undo suffering. This also is not part of the equine slaughter scenario.

There are several viable options to deal with unwanted and excess horses in this country that would serve the equine in a much more responsible manner. Some of these options are already being put into practice. California conducts equine euthanasia clinics where horses can be humanely euthanized by veterinarians that volunteer their time and is subsidized by donations. The British Horse Society is launching a responsible breeding campaign to educate the public and encourage them to think carefully before breeding and adding to the problem. Donating horses to universities, criminal rehabilitation programs, equine assisted programs is another alternative and would allow the owner to get paid the current market value for the horse by way of a tax deduction. It doesn't take a lot of effort to think outside the box and realize that there are more educated and more progressive ways of solving this problem.

Thank you for your time and consideration in this important matter.

Krista Lorenz DVM
108 Painted Pony Dr.
Belgrade, MT 59714
406-388-7179

US Horse Meat is Unsafe for Human Consumption

The main problem with slaughtering US horses for human consumption is that the meat is unsafe because of the medications that horses receive. **These medications are not approved for use in any food animals by the FDA and the USDA.** The medications are legal for horses as they are not considered food animals by either of these agencies. If we are to continue to allow the 1% of the horse population to be slaughtered by foreign companies for human consumption overseas, then we must either 1) lose an estimated 70% of the current medications that US horse population receives so that the drugs do not enter the food supply or 2) implement a tracking system for the 9 million horses in the US, like the passport system that Great Britain has had to do recently, to ensure that these medications are not used in horses sent to slaughter.

Why is American horse meat unsafe for human consumption?

* Horses are not raised nor regulated as food animals in the US. They routinely receive medications that are banned from food animals such as Phenybutazone or "bute", the aspirin of the horse world. Addition medications include Clenbuterol, Ivermectin, fluphanazine, fluoxetine, methylprednisone, dipyrone, gentamycin sulfate, ketoprofen, Regumate and Lasix -- all clearly labeled, "Not for use in animals intended for food."

What is the usage of bute in food animals in the US?

* According to the FDA, there is **no tolerance for bute in food-producing animals**, and they and their by-products are condemned when it is detected. Dairy producers must not use this drug in food-producing cattle and if it is found, those producers will be subject to FDA investigation and possible prosecution. (http://www.fda.gov/OHRMS/DOCKETS/98fr/03-4741.htm). Since horses are not considered food animals in the US, bute is widely administered to horses by veterinarians and horse owners.
* The Food Animal Residue Avoidance Databank (A National Food Safety Project administered through the U.S. Department of Agriculture) prohibited the extralabel use of bute in female dairy cattle 20 months of age or older as of May 29, 2003 because of the likely adverse effect in humans. With this action the use of any phenylbutazone in an adult dairy cow becomes a violation of the Food Drug and Cosmetic Act and one of FDA's highest regulatory priorities. (http://www.farad.org/prohibit.html). Again, this does not apply to horses because the FDA and USDA do not view them as food animals. **Therein lies the issue. US horses are not raised nor regulated as food animals, yet 1% of the 9 million American horses ARE being slaughtered for human consumption overseas.**
* Veterinarians should be in violation of their own AVMA law by administering bute and almost all of the other medications they give to horses -- "Extralabel drug use is not permitted if it would result in a violative food residue or any residue that may present a risk to public health." (http://www.avma.org/onlnews/javma/oct00/s100100a.asp)

What are the side-effects of bute?

* Phenylbutazone has been determined to be a carcinogen to humans by the National Toxicology Program (NTP).
* Phenylbutazone is also known for its ulcerogenic, nephrotoxic, and hemotoxic effects in humans. It is known to induce blood dyscrasias, including aplastic anemia, leukopenia, agranulocytosis, thrombocytopenia, and deaths.

Is bute ok for use in food animals in the countries where US horse meat is consumed?

* No. In the European Union, any horse that has **EVER** received bute in its lifetime is banned from entering the food supply. They have had to implement a costly and complex "passport system" in Great Britain (a country that is also overwhelmingly against horse slaughter) in 2004 to address this very issue for the 8,000-10,000 horses that go to slaughter for human consumption in the EU each year. Additionally, in 2009 ALL horses in the EU are required to be micro-chipped to make sure that their passport matches the animal.

How is the collection of slaughter horses different from cattle?

* US slaughter horses are mainly purchased at auction through independent "killer buyers" contracted by the three foreign-owned horse slaughter houses in the US. The horses are bought from many owners across the country. **There are NO medical records to go with these horses.** In contrast, farm veterinarians are required to hold each cattle herd's medical records for 2 years for trace back requirements of drug records, illness records, etc.

Aren't there inspections on horse meat at slaughterhouses?
* Yes, there are random inspections of horse meat, but horses are not purchased from one owner in one herd like cattle are. They are bought from many owners at many locations and with no medical records. The horse slaughter houses would need to test EVERY horse to make sure they are free of toxic and carcinogenic drugs. This is NOT BEING DONE. At present, there can be NO ASSURANCE that US horse meat is safe for human consumption. **According to our own laws, it is clearly illegal.**

Written by:
Lori Hackman
901 Garden Ave.
Geneva, IL 60134
630-845-8768
lori_hackman@hotmail.com

Were illegal substances found in US slaughter horses?

Yes

Horses slaughtered in the US in 2004: 66,183 **(6.6% / 4,268.08** horses were in violation for "bute" according to the National Residue Program Data - Red Book. Additionally, **13.3% / 8,802.34** were in violation of Penicillin).
Horses slaughtered in the US in 2005: 94,037 **(11.1% / 10,344.07** horses were in violation for "bute" according to the National Residue Program Data - Red Book. Additionally, **25% / 23,509.25** were in violation of Penicillin).
[Only small samples of 15 horses and 8 horses, respectively, were even tested. You can bet the other horses that were not tested got the USDA stamp of approval and were sent overseas, even though it is clearly illegal according to our own food laws and the laws of the European Union.]
These findings do not address rest of the approximately 70% of currently legal medications that horses receive that are illegal in food animals because the **USDA does not test for them as they were never intended to be ingested by humans**. They are legal to be used in horses because they are not considered to be food animals in the United States.
Note: The Red Book does not reflect any findings in 2006, which was the year that the horse slaughterhouses paid for USDA inspectors themselves. **Paying USDA inspectors by the horse slaughterhouses was declared illegal by Congress in 2007 and is in effect today.** This means that even if a horse slaughterhouse was reopened, the meat could not be sold outside of the state. There is no demand for horsemeat for human consumption within the state or anywhere in the US.

The Food and Drug Administration has not approved the use of **phenylbutazone** in food-producing animals; therefore, there are no established **withdrawal** times on product labeling for food-producing species. **Phenylbutazone** is not permitted at any concentration (zero tolerance) in meat, milk, or eggs intended for human consumption.
http://www.usp.org/pdf/EN/veterinary/phenylbutazone.pdf

National Residue Program Data - Red Book
EQUINE
FSIS initiated an alternate testing strategy to ensure equine products exported from the U.S. meet European Union testing requirements in 2004. FSIS scheduled random sampling in which inspectors were requested to collect random samples from horses presented for slaughter. The horse samples were tested for antibiotics, avermectins, chlorinated hydrocarbons/chlorinated organophosphates (CHCs/COPs), flunixin, phenylbutazone, and sulfonamides. Sampled carcasses were held pending laboratory results. Table 119a, Horses, presents testing results by compound class. Table 119b, Specific Violative Residues in Horses, presents the specific residue detected.
2004 FSIS Exploratory Assessments Results
Compound Class: Antibiotics
Number of analyses: 15
Number of nonviolative positives: 0
Number of Violations: 2 (Antibiotic Compound: Penicillin)
Percent violations: 13.3%
Compound Class: CHCs/COPs/Phenylbutazone
Number of analyses: 15
Number of nonviolative positives: 0
Number of Violations: 1 (Non-steroidal anti-inflammatory Compound: Phenylbutazone)
Percent violations: 6.6%
http://www.fsis.usda.gov/PDF/2004_Red_Book_Results.pdf
Pg. 127

National Residue Program Data - Red Book

EQUINE

FSIS continued an alternate testing strategy to ensure equine products exported from the U.S. meet European Union testing requirements in 2005. The horse samples were tested for antibiotics, avermectins, chlorinated hydrocarbons/chlorinated organophosphates (CHCs/COPs), phenylbutazone, and sulfonamides. Table 132a, Horses, presents testing results by compound class. Table 132b, Specific Violative Residues in Horses, presents the specific residue detected.

2005 FSIS Exploratory Assessments Results

Compound Class: Antibiotics
Number of analyses: 8
Number of nonviolative positives: 0
Number of Violations: 2 (Antibiotic Compound: Penicillin)
Percent violations: 25.0%
Compound Class: CHCs/COPs/Phenylbutazone
Number of analyses: 9
Number of nonviolative positives: 0
Number of Violations: 1 (Non-steroidal anti-inflammatory Compound: Phenylbutazone)
Percent violations: 11.1%
http://www.fsis.usda.gov/PDF/2005_Red_Book_Domestic_Results.pdf
Pg. 132

Written by:
Lori Hackman
901 Garden Ave.
Geneva, IL 60134
630-845-8768
lori_hackman@hotmail.com